

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: RHEA BATES Debtor	Case No. 22-11513-amc
Wells Fargo Bank, N.A., Successor by Merger to Wells Fargo Bank Minnesota, N.A. F/K/A Norwest Bank Minnesota, N.A., as Trustee for First Franklin Mortgage Loan Trust 2004-FFH3 Asset-Backed Certificates 2004-FFH3, Movant	Chapter 13
vs. RHEA BATES And Lawrence Bates, (NON-FILING CO-DEBTOR) Respondents	11 U.S.C. §362 and §1301

CERTIFICATION OF DEFAULT

BROCK AND SCOTT, PLLC, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge on February 7, 2023.

In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's failure to cure the default.

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
Attorney for Creditor
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
RHEA BATES

Case No. 22-11513-amc
Chapter 13

Wells Fargo Bank, N.A., Successor by Merger to
Wells Fargo Bank Minnesota, N.A. F/K/A Norwest
Bank Minnesota, N.A., as Trustee for First Franklin
Mortgage Loan Trust 2004-FFH3 Asset-Backed
Certificates 2004-FFH3,
Movant

vs.

RHEA BATES,
Debtor
And
Lawrence Bates
Co-Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of Default has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Brad J. Sadek, Debtor's Attorney
1500 JFK Boulevard
Ste 220
Philadelphia, PA 19102
brad@sadeklaw.com

Kenneth E. West, Bankruptcy Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Office of United States Trustee, US Trustee

Robert N.C. Nix Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

Via First Class Mail:

RHEA BATES
443 ELLIS AVENUE
DARBY, PA 19023

LAWRENCE BATES
443 ELLIS AVENUE
DARBY, PA 19023

Date: September 13, 2023

/s/Andrew Spivack

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Attorney for Creditor

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